

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

Jane Doe,

*Plaintiff,*

No. 1:24-cv-07977

v.

SEAN COMBS, DADDY’S HOUSE RECORDINGS INC.,  
CE OPCO, LLC d/b/a COMBS GLOBAL f/k/a  
COMBS ENTERPRISES LLC, BAD BOY  
ENTERTAINMENT HOLDINGS, INC.,  
BAD BOY PRODUCTIONS HOLDINGS, INC.,  
BAD BOY BOOKS HOLDINGS, INC., BAD BOY  
RECORDS LLC, BAD BOY ENTERTAINMENT LLC,  
BAD BOY PRODUCTIONS LLC,  
and ORGANIZATIONAL DOES 1-10.

**NOTICE OF MOTION**

*Defendants.*

-----X

**PLEASE TAKE NOTICE** that on a date and time to be set by the Court, Plaintiff Jane Doe (“Plaintiff”), by and through her attorneys, The Buzbee Law Firm, shall move for entry of an Order granting Plaintiff’s Motion to Proceed Anonymously.

**PLEASE TAKE FURTHER NOTICE** that the moving party shall rely upon the accompanying Motion and Incorporated Memorandum of Law in support thereof.

Dated: OCTOBER 24, 2024

Respectfully submitted,

**THE BUZBEE LAW FIRM**

By: /s/ Anthony G. Buzbee  
Anthony G. Buzbee  
Texas Bar No. 24001820  
[tbuzbee@txattorneys.com](mailto:tbuzbee@txattorneys.com)

Christopher J. Leavitt  
Texas Bar No. 24053318  
[cleavitt@txattorneys.com](mailto:cleavitt@txattorneys.com)  
Ryan S. Pigg  
Texas Bar No. 24088227  
[rpigg@txattorneys.com](mailto:rpigg@txattorneys.com)  
David C. Fortney  
Texas Bar No. 24068740  
[dfortney@txattorneys.com](mailto:dfortney@txattorneys.com)  
Colby Holler  
Texas Bar No. 24126898  
[choller@txattorneys.com](mailto:choller@txattorneys.com)  
Crystal Del Toro  
Texas Bar No. 24090070  
[cdeltoro@txattorneys.com](mailto:cdeltoro@txattorneys.com)  
J.P. Morgan Chase Tower  
600 Travis, Suite 7500  
Houston, Texas 77002  
Telephone: (713) 223-5393  
Facsimile: (713) 223-5909

*Attorneys for Plaintiff Jane Doe*

- AND -

**AVA LAW GROUP**  
Andrew Van Arsdale  
CA Bar No. 323370  
[andrew.vanarsdale@avalaw.com](mailto:andrew.vanarsdale@avalaw.com)  
3667 Voltaire Street, Ste. 101  
San Diego, CA 92106  
Telephone: (800) 777-4141  
Facsimile: (619) 222-3667

- AND -

**CURIS LAW, PLLC**  
Antigone Curis  
[antigone@curislaw.com](mailto:antigone@curislaw.com)  
52 Duane Street, 7th Floor  
New York, New York 10007  
Phone: (646) 335-7220  
Facsimile: (315) 660-2610